

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**STEVE M. BAJIC,
RAJESH TANEJA,
NORFOLK HEIGHTS LTD.,
FOUNTAIN DRIVE LTD.,
ISLAND FORTUNE GLOBAL LTD.,
CRYSTMOUNT LTD.,
WISDOM CHAIN LTD.,
SSID LTD.,
SURE MIGHTY LTD.,
TAMARIND INVESTMENTS INC.,
KENNETH CIAPALA,
ANTHONY KILLARNEY,
BLACKLIGHT SA,
CHRISTOPHER LEE MCKNIGHT, and
AARON DALE WISE,**

Defendants.

Civil Action No. 20-cv-00007-LGS

**PLAINTIFF'S MOTION FOR AN
ORDER FREEZING AND REPATRIATING ASSETS**

Pursuant to Fed. R. Civ. P. 65(b), plaintiff United States Securities and Exchange Commission (the "Commission" or "SEC") hereby files this motion for entry of an order freezing and repatriating assets belonging to defendants Steve M. Bajic, Rajesh Taneja, Norfolk Heights Ltd., Fountain Drive Ltd., Island Fortune Global Ltd., Crystalmount Ltd., Wisdom Chain Ltd., SSID Ltd., Sure Mighty Ltd., and Tamarind Investments Inc. (collectively, the "Bajic-Taneja Defendants"). A proposed form of Order is attached hereto. In support of this motion, the Commission submits the accompanying memorandum of law, the declaration of Trevor Donelan and the declaration's twelve exhibits.

WHEREFORE, the Commission respectfully requests that the Court enter the Order Freezing and Repatriating Assets filed herewith.

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION
By its attorneys,

/s/ Alicia Reed

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DATED: January 6, 2020

Certificate of Service

I hereby certify that, on January 6, 2020, a true and correct copy of the foregoing document, the supporting memorandum of law, and the supporting declaration of Trevor Donelan and its exhibits were filed through the Court's CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notice in this case. In addition, the Commission has served a copy of the foregoing document on the following individuals and entities, who are not represented or registered to receive electronic notices in this case, at the following addresses and by the following means:

Defendants:

Steve Bajic

By email to counsel who may represent Bajic in this matter but that representation has

not been confirmed

Rajesh Taneja

By email address used in connection with his brokerage and bank accounts

Norfolk Heights Ltd., Fountain Drive Ltd., Island Fortune Global Ltd., Crystalmount Ltd.,
Wisdom Chain Ltd., SSID Ltd., Sure Mighty, Ltd., Tamarind Investments Inc.

By email addresses used in connection with their brokerage and bank accounts

Kenneth Ciapala

The Commission is currently exploring methods to serve Mr. Ciapala, who is presently in custody in the United Kingdom

Anthony Killarney and Blacklight SA

The Commission is planning to serve Mr. Killarney via the Hague Convention in Switzerland

Christopher McKnight

By email to counsel who has represented Mr. McKnight in other matters but whose representation in this matter is uncertain

Aaron Dale Wise

By email to counsel who represented Mr. Wise during the investigation that led to the filing of this action, but whose representation in this matter is uncertain

/s/ Kathleen Burdette Shields

Kathleen Burdette Shields